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Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

OCT - 2 1998

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

In the Matter of)
)
 Amendment of Section 73.202(b)) MM Docket No. 98-149
 Table of Allotments,) RM-9331
 FM Broadcast Stations)
 (Long Beach and Shallotte,)
 North Carolina))

To: Chief, Allocations Branch

COMMENTS

Morfield, L.L.C., the permittee of WAZO(FM), Channel 252C3, Shallotte, North Carolina, by its attorneys and pursuant to Notice of Proposed Rule Making, DA 98-1550, released August 14, 1998, hereby submits its Comments in support of the reallocation of Channel 252C3 from Shallotte to Long Beach, North Carolina, and the modification of the WAZO(FM) license to specify Long Beach as its community of license.^{1/} In support hereof, the following is respectfully submitted:

1. Morfield, L.L.C., in these Comments, hereby incorporates its July 14, 1998 Petition for Rule Making in support of the proposed reallocation. Morfield, L.L.C. also restates its present intention to apply for Channel 252C3 at Long Beach, North Carolina, when allotted, and when authorized, to build the station promptly.

2. The Notice of Proposed Rule Making requested Morfield, L.L.C. to provide a showing of the areas and populations which

^{1/} The Notice of Proposed Rule Making specified a deadline date of October 5, 1998 for the filing of comments. Accordingly, these comments are timely filed.

will receive new service, and the areas and populations which will lose existing service, should Channel 252C3 be reallocated to Long Beach. Attached to these Comments is an Engineering Exhibit prepared by Timothy W. Warner, technical consultant to Morfield, L.L.C., which sets forth loss and gain calculations at page 3. Although modest gains and losses are shown, it is respectfully submitted that, as the WAZO facilities are not yet constructed, there is no population or area presently receiving service from WAZO, and thus no population or area will actually lose service from WAZO should Channel 252C3 be reallocated to Long Beach. Under these circumstances, the usual concern with the public's "legitimate expectation that existing service will continue," Community of License, 5 FCC Rcd at 7097 (1990), is inapplicable.

3. In addition, the Notice of Proposed Rule Making requested a showing as to the number of reception services which are now available within the calculated gain and loss areas. The attached Engineering Exhibit demonstrates that the entire theoretical loss area is well-served by at least 8 full-time aural services.

4. In summary, the reallocation of Channel 252C3 from Shallotte to Long Beach would result in a preferential arrangement of allotments pursuant to the Commission's change of community procedures. The proposed reallocation will provide first local aural transmission service at Long Beach, while not depriving Shallotte of its only local aural service. As WAZO(FM) has not yet been constructed, the reallocation will not remove a

service that the public has become reliant on. Any areas and populations projected to theoretically lose service are all already well-served. Accordingly, we respectfully submit that the public interest would be well-served by the proposed reallocation.

WHEREFORE, for the reasons above, Channel 252C3 should be reallocated from Shallotte to Long Beach, North Carolina, and the license of WAZO(FM), should be modified to specify Long Beach as its community of license.

Respectfully submitted,

MORFIELD, L.L.C.

By: Ellen S. Mandell

Ellen S. Mandell
Its Attorney

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October 2, 1998

WAZO

Morfield, L.L.C.

Shallotte, North Carolina

Engineering Exhibit

September 1998

Timothy L. Warner, Inc.
87 North Liberty Street
Asheville, North Carolina 28801
(828) 258-1238

WAZO
Morfield, L.L.C.
Shallotte, North Carolina

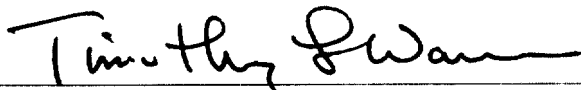
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WAZO
Morfield, L.L.C.
Shallotte, North Carolina

Declaration

I declare, under penalty of perjury, that I am a technical consultant to broadcasting and other communications systems, that I have over twenty-five years of experience in the engineering of broadcast and other communications systems, that I am familiar with the Federal Communications Commission's Rules found in the Code of Federal Regulations Title 47, that I am a Professional Engineer registered in North Carolina, that I have prepared or supervised the preparation of the attached Engineering Exhibit for Morfield, L.L.C., and that all of the facts therein, except for facts of which the Federal Communications Commission may take official notice, are true to the best of my knowledge and belief.



Timothy L. Warner, P.E.
87 North Liberty Street
Asheville, North Carolina 28801
(828) 258-1238
28 September 1998

WAZO
Morfield, L.L.C.
Shallotte, North Carolina

Narrative

This exhibit is in support of a petition of Morfield, L.L.C. permittee for WAZO (FM), a new FM station allocated to Shallotte, North Carolina to change the city of license from Shallotte, North Carolina, to Long Beach, North Carolina.

This exhibit responds to the Notice of Proposed Rule Making, DA 98-1550, in MM Docket No. 98-149, RM-9331, released August 14, 1998. This exhibit tabulates the area and population within the loss and gain areas and lists the services available.

Service Population and Area

The proposed change in transmitter sites is minor, and the population changes are correspondingly minor. Figure 1 shows the 60 dBu F(50,50) contours for the authorized WAZO site and for the proposed Long Beach site. Most of the population that would receive service from the authorized facilities will receive service from the proposed facilities. The table that follows provides details on areas and populations that receive service. Loss and gain areas are tabulated only for land areas; salt water areas that are not part of the continental United States are not included¹.

¹ The proposed area, including salt water is 4,799 square kilometers; the existing area is 4,565 square kilometers. There is no difference in the population.

	Area (sq. km.)	%	Population	%
Authorized WAZO	2,647		138,019	
Proposed Long Beach	1,933	73.0%	138,778	100.5%
Loss	750	28.3%	12,416	9.0%
Gain	38	1.4%	12,900	9.3%
Gain + Loss	788	29.8%	25,316	18.3%

Note that since the WAZO facilities are not constructed, there is no population presently receiving service from WAZO that will lose service from WAZO.

Full Time Reception Services

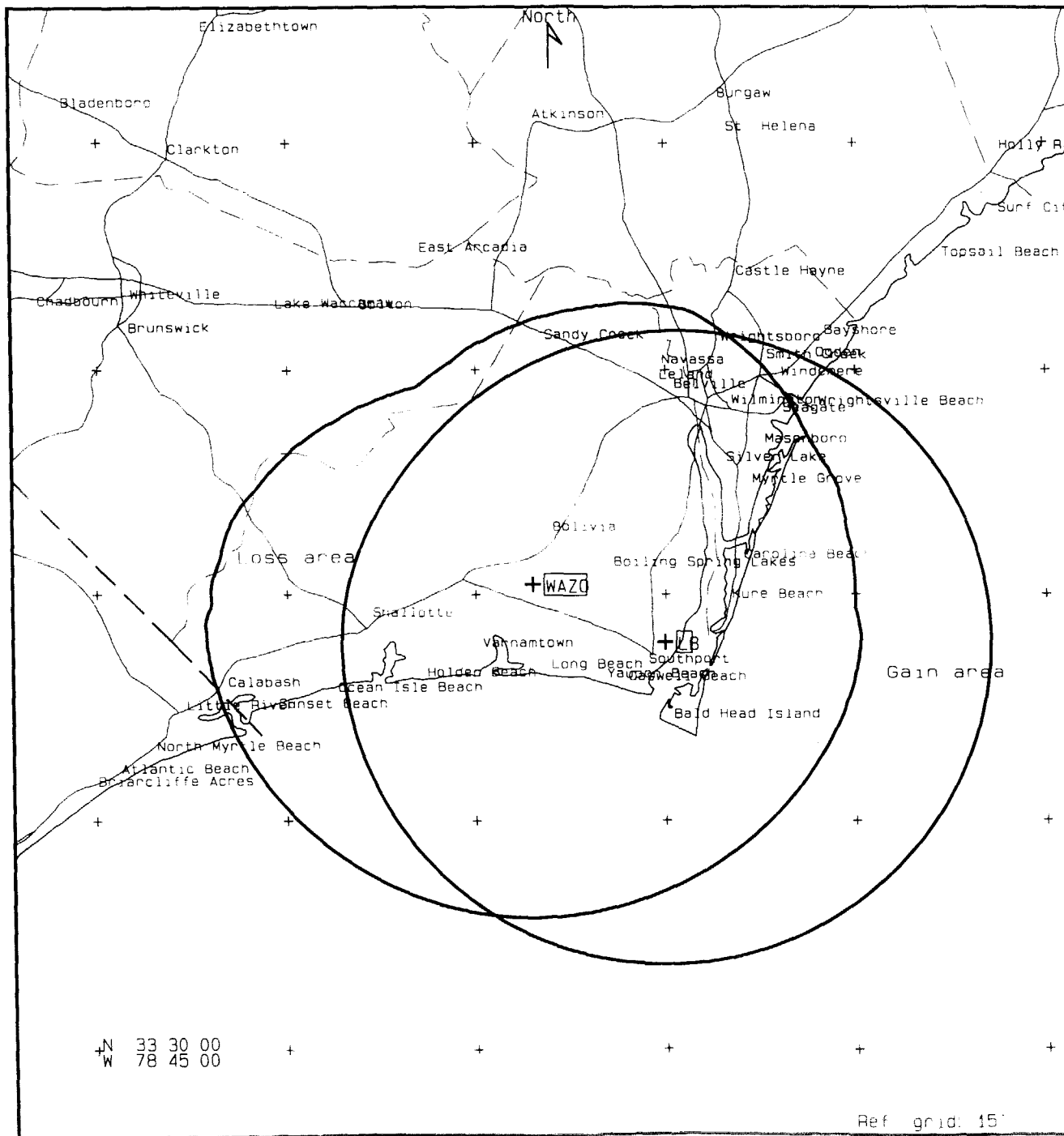
Figure 2 shows full time FM aural services in the vicinity of WAZO. The authorized 60 dBu F(50,50) contour is shown by a dashed line. The proposed contour is shown by a line with dashes and dots.

Other aural services are shown by solid lines. In the area that would have received service from the authorized WAZO site but will not receive service from the proposed site, there are at least 8 full time aural services. The entire area, therefore, qualifies as well served. The area with the fewest services is indicated by the number "8" on Figure 2.

The other services considered are tabulated below

Station	Ant Elv AMSL (mtrs)	ERPd (dBW)	Ant. Type	Ant. Orient (degs)	Coordinates	Antenna Filename
WMIW	188.0 88.9000 MHz	50.00	DA-C	.0 N W	34 5 41 00 78 28 2 00	wmiw.pat
WWIL	106.0 90.5000 MHz	43.01	OM-V	.0 N W	34 10 5 00 78 2 33 00	
WHQRC	603.0 91.3000 MHz	41.30	DA-C	.0 N W	34 1 53 00 78 17 17 00	whqr.pat
WJYR	112.0 92.1000 MHz	46.99	OM-C	.0 N W	33 43 18 00 78 53 48 00	
WQSL	226.0 92.3000 MHz	43.52	OM-C	.0 N W	34 31 10 00 77 26 12 00	
WDZD	106.0 93.5000 MHz	37.78	OM-C	.0 N W	33 56 1 00 78 23 18 00	
WAAV	53.0 94.1000 MHz	36.99	OM-C	.0 N W	34 9 1 00 78 4 18 00	
WVCO	163.0 94.9000 MHz	34.23	OM-C	.0 N W	33 59 40 00 78 46 13 00	
WMNXC	276.0 97.3000 MHz	50.00	OM-C	.0 N W	34 3 1 00 78 4 46 00	
WKOQ	303.0 98.7000 MHz	50.00	OM-C	.0 N W	34 29 38 00 77 29 3 00	
WZFX	333.0 99.1000 MHz	50.00	OM-C	.0 N W	34 44 5 00 78 47 35 00	
WMYB	143.0 99.5000 MHz	41.30	OM-C	.0 N W	33 49 9 00 78 43 40 00	
WKXBC	245.0 99.9000 MHz	50.00	OM-C	.0 N W	34 34 37 00 78 7 14 00	

Station	Ant Elv AMSL (mtrs)	ERPd (dBW)	Ant. Type	Ant. Orient (degs)	Coordinates	Antenna Filename
WSTS	176.0	46.99	OM-C	.0 N	34 16 17.00	
	100.9000			W	78 56 24.00	
WWQQ	169.0	46.02	OM-C	.0 N	34 3 11.00	
	101.3000			W	77 51 20.00	
WKZQ	185.0	45.80	OM-C	.0 N	33 56 14.00	
	101.7000			W	78 57 42.00	
WGNJ	307.0	50.00	OM-C	.0 N	34 3 11.00	
	102.7000			W	78 54 46.00	
WYAK	165.0	39.03	OM-C	.0 N	33 47 41.00	
	103.1000			W	78 52 11.00	
WYAVC	301.0	50.00	OM-C	.0 N	33 35 41.00	
	104.1000			W	79 2 34.00	
WRQR	119.0	36.53	OM-C	.0 N	34 12 46.00	
	104.5000			W	77 56 13.00	
WYNAC	95.0	43.98	OM-C	.0 N	33 49 19.00	
	104.9000			W	78 46 13.00	
WXQR	247.0	42.79	OM-C	.0 N	34 21 10.00	
	105.5000			W	77 56 12.00	
WNMB	114.0	42.30	OM-C	.0 N	33 51 16.00	
	105.9000			W	78 43 11.00	
WCCA	103.0	37.78	OM-C	.0 N	34 2 50.00	
	106.3000			W	78 16 12.00	
WLGX	107.0	37.48	OM-C	.0 N	34 3 12.00	
	106.7000			W	77 57 10.00	
WWSK	165.0	46.99	OM-C	.0 N	33 56 41.00	
	107.1000			W	78 57 13.00	
WSFM	184.0	45.05	OM-C	.0 N	34 3 12.00	
	107.5000			W	77 57 10.00	



CVR (tm): wazo.map

Propagation model: FCC-FCC

Time: 50.00% Loc: 50.00% Margin: .0 dB

Climate: Continental Temperate

Gndcvr: None

Atm. factor: None

K Factor: 1.333

RX Antenna: Omni

Height: 9.1 mtrs AGL Gain: .0 dBd

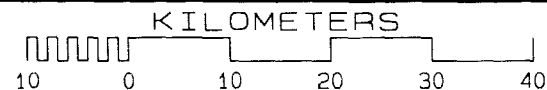
Field strength (at remote)



60.0 dBuV/m

Minimum threshold level -150.0 dBmW

Site	Ant Elv AMSL (mtrs)	ERPd (dBW)	Ant. Type /Orient	Coordinates
WAZO	111.0	43.98	DA-V	N 34 0 39.00
grp: 1	98.3000 MHz		.0	W 78 10 28.00
LB	* 102.0	43.98	OM-H	N 33 56 49.00
grp: 1	100.0000 MHz			W 78 0 4.00



WAZO

Shallotte and Long Beach


980928

Figure 1

CERTIFICATE OF SERVICE

I, Veronica A. Pierce, a secretary in the law firm of Pepper & Corazzini, L.L.P., do hereby certify that the foregoing "Comments" were hand delivered on October 2, 1998 to the following:

John A. Karousos, Chief
Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554



Veronica A. Pierce